



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

MAR 07 2002

Colonel Donald R. Curtis  
District Engineer  
U.S. Army Corps of Engineers  
Kansas City District  
700 Federal Building  
Kansas City, Missouri 64106-2896

Dear Colonel Curtis:

RE: Missouri River Fish and Wildlife Mitigation Project - Environmental Impact Statement

This letter responds to your letter of February 7, 2002 wherein you request for the United States Environmental Protection Agency (EPA) to be a Cooperating Agency for the Missouri River Fish and Wildlife Mitigation Project per 40 Code of Federal Regulations 1501.6. EPA accepts this responsibility as further detailed in the enclosed Memorandum of Agreement (MOA).

I am sending two signed copies of the proposed MOA. Upon your signature, please keep one and return one for our records. If you have questions, please call me at (913) 551-7001 or Stephen Smith, a member of the NEPA team, at (913)-551-7656.

Sincerely,

Leo J. Alderman  
Division Director  
Environmental Services Division

Enclosed



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Missouri Ecological Services Field Office  
608 East Cherry Street, Room 200  
Columbia, Missouri 65201  
Phone: (573) 876-1911 Fax: (573) 876-1914



February 21, 2002

Colonel Donald R. Curtis  
U.S. Army Corps of Engineers  
Kansas City District  
700 Federal Building  
Kansas City, Missouri 64106-2896

Dear Colonel Curtis:

This is in reference to a February 2, 2002, facsimile on the Missouri River Fish and Wildlife Mitigation Project, Draft Supplemental Environmental Impact Statement (DSEIS) that included information on the schedule, proposed alternatives, and study outline. We have also received a February 7, 2002, letter from Mr. Kelly Ryan, Project Manager, requesting the Fish and Wildlife Service (Service) to serve as a cooperating agency for the SEIS. The Service has reviewed those documents and submits the following comments pursuant to the National Environmental Policy Act (NEPA) (42 U.S.C. 4321-4327) and the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.).

### NEPA Comments

The Service accepts your invitation to serve as a cooperating agency on the SEIS. Because of the Service's statutory responsibilities and expertise in fish and wildlife resources, we will provide the Corps resource-related input throughout the NEPA process, as well as review various draft documents and reports. As part of that input, we offer the following scoping comments based on the information referenced in the previous paragraph.

We have not yet seen a draft of the "Purpose and Need" section of the study, but assume it will detail the fish and wildlife losses resulting from the Bank Stabilization and Navigation Project (BSNP) and the importance of compensating those losses through habitat restoration along the lower river. We request a copy of the draft "Purpose and Need" be provided for our review since it greatly influences the direction of much of the content in the SEIS. The Corps is proposing seven potential alternatives for consideration, some of which refer to the Missouri River Biological Opinion (BO). Although there is a close relationship between riverine restoration and the future conservation of federally listed species, we believe the Corps should very carefully consider how it uses components of the Reasonable and Prudent Alternative (RPA) in the BO to develop project alternatives. This underscores the importance of the "Purpose and Need" statement (i.e., compensating fish and wildlife habitat losses along the lower river) in the document, which should essentially guide the preliminary selections of project alternatives. In addition, as written in the table "Summary of Potential Alternatives," alternatives such as

"50,000 acres plus Biological Opinion" implies acres in addition to the 50,000, not inclusive. In the SEIS, any references to BO should be as specific as possible because the BO includes a number of elements beyond the scope of the current mitigation project and such references could be confusing to the reader. We assume that the Corps intends to refer to the habitat restoration goals identified in the BO, that is the shallow water habitat. The SEIS should note that the purpose of those goals are more narrowly focused than those of the mitigation project. While the mitigation project may play a critical role in eventually achieving those goals, its mandate includes habitat restoration for floodplain habitat as well.

The draft SEIS outline appears to cover the major resource topics. We note, however, that recreation appears only under Land Use and Ownership. The Service strongly recommends that river-related recreation and other fish and wildlife-related pursuits also be addressed in terms of their local and regional economic benefits (e.g., under socioeconomic resources-sections 3.5 and 4.5). We believe there is great opportunity along the lower river in developing important and sustainable natural resources and associated activities to help diversify and benefit the local communities. For example, the Missouri Tourism Board and the Missouri Department of Economic Development (MDED) have documented economic benefit of natural resources to the state of Missouri. In 1999, tourism provided \$12 billion in economic benefits to the state (MDED 2000). Wildlife watching provided Missouri \$16.7 million in state sales tax revenue and \$8.0 million in state income tax revenue (USFWS 1996). Recreational fishing and hunting expenditures in the state of Missouri is in the billions of dollars (Weithman 1991). The MDED (2001) reported on the positive impact of natural amenities on population and employment in Missouri. The study found that above average natural amenities and a diversified economy are the major determinants of population growth and moderate determinants of employment growth. The study concludes: "In Missouri, it is increasingly important to include natural amenities as a factor in any economic development strategy." The neighboring states likely have similar studies to document the importance of natural resource-related activities to their communities. Finally, although not easily quantified, restored ecologic functions associated with the mitigation project provide extremely valuable services to the public. For example, during recent high-water events on the lower river, the river stage predictions were higher than actual river levels. This was attributed, in part, to increased flood water storage in those restoration areas that had been reconnected to the river, thus attenuating the peak flood stage. The SEIS should, in some way, try to address such services and their value to the public.

The Service believes the SEIS provides an excellent opportunity to describe for the public what the project has accomplished to date. The "Affected Environment" section should clearly describe the projects that have been completed and what they have accomplished not only in terms of acreage acquired or restored, but also in terms of habitat development, ecologic functions, and benefits for the fish and wildlife communities that depend on the river and adjacent floodplain. Ideally, the section should also describe public use of those areas and the benefits to local communities from restoration work that has been completed.

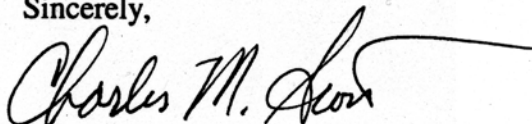


## Fish and Wildlife Coordination Act Comments

The Service strongly supports the states' and the Corps continued commitment to compensative fish and wildlife habitat losses along the channelized river. Since our 1980 Fish and Wildlife Coordination Act report, there have been a number of habitat restoration efforts in the study area. As part of the amended mitigation project, the Service prepared an April 2000 planning aid letter in support of the additional mitigation acreage that was attached to the Corps cost estimate report to Congress. In accordance with the coordination and consultation provisions of FWCA, the Service requests a copy of the final report that went to Congress as soon as possible. To accompany the Corps SEIS, we will prepare a supplement to the 1980 FWCA report that will summarize subsequent restoration efforts as well as results from biological studies along the lower river. In addition, we will provide recommendations on the most successful types of restoration methods to date and suggestions to maximize resource benefits by coordinating with other ongoing restoration efforts. A copy of a draft Scope of Work summarizing the schedule, deliverables, and funding needs is enclosed. Please review that scope and provide us your comments at your earliest convenience.

Thank you for the opportunity to comment on the mitigation project. We look forward to working with the Corps as the project progresses. If you have any questions regarding our comments, please contact Jane Ledwin at (573) 876-1911, extension 109.

Sincerely,



Charles M Scott  
Field Supervisor

### Enclosure

cc: MDC, Jefferson City, MO (Epperson) (w/o enclosure)  
KGP, Topeka, KS (Adams) (w/o enclosure)  
NG&P, Lincoln, NE (Zuerlein) (w/o enclosure)  
IDNR, Des Moines, IA (Szcodronski) (w/o enclosure)  
HDR, Kansas City, MO (Mike Snyder) (w/o enclosure)  
USFWS, Big Muddy NFWR, Columbia, MO (Bell) (w/o enclosure)  
USFWS, ES, Manhattan KS, (Gill) (w/o enclosure)  
USFWS, DeSoto NWR, Missouri Valley, IA (Klimek) (w/o enclosure)  
USFWS, ES, Grand Island, NE (Anschutz) (w/o enclosure)  
USFWS, Boyer Chute NWR, Blair, NE (Schultz) (w/o enclosure)  
USFWS, Missouri River Coordinator, Bismarck, ND (Olson) (w/o enclosure)  
USFWS, Columbia FRO (Milligan) (w/o enclosure)



STATE OF KANSAS  
DEPARTMENT OF WILDLIFE & PARKS

Office of the Secretary  
900 SW Jackson, Suite 502  
Topeka, KS 66612-1233  
785/296-2281 FAX 785/296-6953



March 21, 2002

Colonel Donald R. Curtis  
U.S. Army Corps of Engineers  
Kansas City District Office  
700 Federal Building  
Kansas City, MO 64106-2896

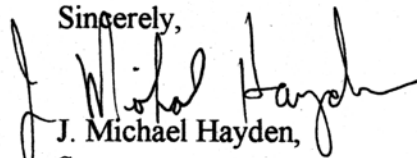
Dear Colonel Curtis;

We appreciate the opportunity to officially be a cooperating agency of the Supplemental Environmental Impact Statement for the Missouri River Fish and Wildlife Mitigation Project. The Department gladly accepts this invitation and we look forward to working with the Corps on this important effort.

We have appreciated the efforts of the Kansas City District staff over the past years as we have worked together to plan and implement the Mitigation Project. As we move forward with this next step in restoration of fish and wildlife habitat along the Missouri River, we appreciate the opportunity to continue this valuable partnership.

Please let us know however we can be of assistance in this process.

Sincerely,

  
J. Michael Hayden,  
Secretary



# Nebraska Game and Parks Commission

2200 N. 33rd St. / P.O. Box 30370 / Lincoln, NE 68503-0370

Phone: 402-471-0641 / Fax: 402-471-5528 / <http://www.ngpc.state.ne.us/>

February 21, 2002

Kelly Ryan  
Corps of Engineers, Kansas City District  
700 Federal Building  
Kansas City, Missouri 64106

Dear Mr. Ryan:

We have received your letter regarding the reauthorization of the existing Missouri River Fish and Wildlife Mitigation Project which is a component of the 1999 Water Resources Development Act (WRDA99). Your letter also invited the Nebraska Game and Parks Commission (NGPC) to serve as a Cooperating Agency for the Supplemental Environmental Impact Statement process.

We fully support this expanded effort, as NGPC staff members have been active participants in the Missouri River Mitigation Project from early planning stages to the present. We commend the effort made by Corps of Engineers (COE). The project as outlined will restore much-needed functions of aquatic and terrestrial habitat, which were largely lost from decades of modifications to the Missouri River.

We will gladly continue our participation on the Coordination Team and will provide information on the review requests of the draft and final SEIS which will be produced in the near future. We have had an excellent working relationship with the COE and look forward to continuing in that role on this expanded Missouri River Mitigation Project.

Thank you for the invitation and feel free to call me at 402-471-5422 if you have any questions or need any additional information.

Sincerely,

Frank Albrecht  
Assistant Division Administrator  
Realty and Environmental Services Division

cc Scott Luedtke, NGPC  
Mark Brohman, NGPC  
Gene Zuerlien, NGPC  
Gerald Mestl, NGPC



# STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR  
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
JEFFREY R. VONK, DIRECTOR

February 18, 2002

Mr. Kelly Ryan  
Kansas City District, Corps of Engineers  
700 Federal Building  
Kansas City, MO 64106-2896

Dear Mr. Ryan:

I am pleased on behalf of the Iowa Department of Natural Resources to accept your invitation to serve as a Cooperating Agency for the Supplemental Environmental Impact Statement (SEIS) for the Missouri River Fish and Wildlife Mitigation Project. We have enjoyed a good working relationship with your agency on the mitigation project and we look forward to maintaining our active involvement on the Coordination Team. We also appreciate the opportunity for advance review of the draft and final SEIS.

Thank you again, and we agree that the Mitigation Project is very important to the future of fish and wildlife resources of the Missouri River.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey R. Vonk".

Jeffrey R. Vonk  
Director



# MISSOURI DEPARTMENT OF CONSERVATION

## Headquarters

2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180  
Telephone: 573/751-4115 ▲ Missouri Relay Center: 1-800-735-2966 (TDD)

JERRY M. CONLEY, Director

February 15, 2002

Mr. Kelly Ryan  
Department of the Army  
Kansas City District, Corps of Engineers  
700 Federal Building  
Kansas City, MO 64106

Dear Mr. Ryan:

This letter is in response to your February 7, 2002 correspondence in which you invited the Missouri Department of Conservation to be a cooperating agency for the modified Mitigation Project's Supplemental Environmental Impact Statement (SEIS).

The Missouri Department of Conservation is unwavering in our support of the Missouri River Bank Stabilization and Navigation, Fish and Wildlife Mitigation Project. Department participation in the Project selection and implementation process has been a very positive experience. We look forward to future on-the-ground benefits for Missouri fish and wildlife.

We agree to continue our participation on the Mitigation Project Coordination Team and to review and provide comments on the draft and final SEIS. Ms. Jane Epperson will be your point of contact.

Sincerely,

DAN WITTER  
CHIEF, POLICY COORDINATION SECTION

c: Jane Epperson, Gary Christoff

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